


U.S. Magistrate Judge

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

TRANSCOM ENHANCED
SERVICES, INC.,

v.

THE TENNESSEE REGULATORY
AUTHORITY, ET AL.

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No. 3:12-CV-679

Judge Campbell

Magistrate Judge Knowles

PLAINTIFF'S MOTION FOR LEAVE
TO FILE REPLY BRIEF

NOW COMES Petitioner/Plaintiff, TRANSCOM ENHANCED SERVICES, INC. ("Plaintiff" or "Transcom"), and moves for leave to file a reply brief in support of Transcom's motion for leave to amend complaint and join additional parties. The proposed reply brief, directed to both the objection of the Tennessee Regulatory Authority ("TRA") [Doc. # 27] and the response of the RLECs [Doc. # 28]¹ (collectively the "Responses") and is attached as Exhibit A.

On June 18, Transcom filed a petition for review of a final decision of the TRA, which (among other things) erroneously held that Transcom was not an enhanced service provider. The RLECs subsequently intervened in the state court proceeding.

On July 6, 2012, the TRA and the RLECs jointly removed this action on the basis of federal question jurisdiction. Such removal was proper, since many of the grounds for review

¹ The "RLECs" are Intervening Defendants Concord Telephone Exchange, Inc.; Humphries County Telephone Co.; Tellico Telephone Company; Tennessee Telephone Company; Crockett Telephone Company, Inc.; Peoples Telephone Company; West Tennessee Telephone Company, Inc.; North Central Telephone Coop., Inc.; and Highland Telephone Cooperative, Inc.